

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ALEXIAN BROTHERS HOSPITAL
NETWORK, et al.,

Plaintiffs,

v.

NATIONAL IMAGING ASSOCIATES, INC.,

Defendants.

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Case No. 08 CV 4268

Judge St. Eve
Magistrate Judge Cole

**AGREED MOTION OF DEFENDANT FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING**

Defendant National Imaging Associates, Inc. ("Defendant"), by its undersigned counsel, moves pursuant to Fed.R.Cvi.P. 6(b) for an enlargement of time to and including September 19, 2008 in which to file its responsive pleading to Plaintiffs' Complaint, and in support thereof states as follows:

1. Defendant's responsive pleading presently is due August 20, 2008. Counsel for Defendant, however, was just recently retained, is continuing its investigation of the allegations contained in the Complaint and gathering documents relevant to the Complaint, but requires an additional 30 days to file Defendant's responsive pleading.

3. On August 14, 2008, one of the attorneys for Defendant, Jason M. Kuzniar, conferred with counsel for Plaintiffs, John E. Dougherty and Daniel J. Lawler, and Messrs. Dougherty and Lawler have no objection to the relief requested herein.

4. This is Defendant's first request for an extension of time and Plaintiffs will not be prejudiced by the extension.

WHEREFORE, Defendant respectfully requests that the Court grant this Agreed Motion, giving Defendant to and including September 19, 2008 to file its responsive pleading to

Plaintiffs' Complaint, and award to Defendant such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

National Imaging Associates, Inc., Defendant

By: /s/ Jason M. Kuzniar
One of their attorneys

Daniel E. Tranen, Esq.
Jason M. Kuzniar, Esq.
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on the 14th day of August 2008, the above and foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and that a true and correct copy was served on the following by CM/ECF Electronic Notification:

John E. Dougherty, Esq.
(jmdocs@ameritech.net)

Daniel J. Lawler, Esq.
(dlawler@bellboyd.com)

/s/ Jason M. Kuzniar
Jason M. Kuzniar